

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**INTERNATIONAL UNION, UNITED
AUTOMOBILE, AEROSPACE, AND
AGRICULTURAL IMPLEMENT
WORKERS OF AMERICA,**

Plaintiff,

v.

GENERAL MOTORS LLC,

Defendant.

2:10-cv-11366-AC-MJH

**Honorable Avern Cohn
Magistrate Judge Michael Hluchaniuk**

CONSENT MOTION TO STRIKE DOCKET ENTRY 35

Plaintiff International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (“UAW”) respectfully requests that the Court strike from the public docket the redacted version of the UAW’s Statement of Materials Facts Not Genuinely in Dispute (Dkt. No. 35). In support of this Motion, the UAW states as follows:

1. On November 15, 2012, Plaintiff filed a Motion for Summary Judgment (Dkt. No. 33).
2. In connection with its Motion for Summary Judgment, Plaintiff also filed a Statement of Material Facts Not Genuinely in Dispute (“SMF”). Because the SMF contained material covered by the Stipulated Confidentiality Protective Order, the SMF was filed under seal (Dkt. No. 36).
3. Plaintiff also filed a redacted version of the SMF in the public record (Dkt. No. 35).

4. Plaintiff has since learned that the redacted version of the SMF contains an error. This error is not duplicated in the sealed version of the SMF. Plaintiff also understands that a redacted version of the SMF was unnecessary and need not have been filed.
5. Accordingly, Plaintiff requests that the redacted SMF that appears at Docket No. 35 be stricken from the record in its entirety.
6. Undersigned counsel spoke with Defendant's counsel Johanna F. Parker by telephone on November 19, 2012. Ms. Parker stated that Defendant consents to the relief sought in this Motion.

Respectfully submitted,

Jeffrey D. Sodko (P65076)
jsodko@uaw.net
Associate General Counsel,
International Union, UAW
8000 East Jefferson Avenue
Detroit, Michigan 48214
Telephone: (313) 926-5216
Facsimile: (313) 926-5240

/s/ RAMYA RAVINDRAN
Andrew D. Roth (DC Bar 414038)
aroth@bredhoff.com
Ramya Ravindran (DC Bar 980728)
rravindran@bredhoff.com
W. Gary Kohlman (DC Bar 177527)
gkohlman@bredhoff.com
BREDHOFF & KAISER, PLLC
805 Fifteenth Street, N.W., Suite 1000
Washington, D.C. 20005
Telephone: (202) 842-2600
Facsimile: (202) 841-1888

Dated: November 19, 2012

Counsel for Plaintiff UAW

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2012, I electronically filed the above Consent Motion to Strike Docket Entry 35 with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Robert S. Walker
Email: rswalker@jonesday.com
Jones Day
North Point, 901 Lakeside Avenue
Cleveland, Ohio 44114

Johanna F. Parker
Email: jfparker@jonesday.com
Jones Day
North Point, 901 Lakeside Avenue
Cleveland, OH 44114-1190

Edward W. Risko
Email: edward.w.risko@gm.com
General Motors Corporation
Legal Staff
300 Renaissance Center
Suite MC 482-C24-C66
Detroit, MI 48265-3000

A copy of the proposed order has been sent to the parties above via electronic mail.

/s/ RAMYA RAVINDRAN
Ramya Ravindran (DC Bar 980728)
Bredhoff & Kaiser, PLLC
805 Fifteenth Street, N.W., Suite 1000
Washington, DC 20005
(202) 842-2600
Email: rravindran@bredhoff.com